

DAMP Performance Commitments

		Region 8 Comments	Region 9 Comments 2/20/01
Program Management (Section 2.0)			
1	The Permittee Committee shall meet at least three times per reporting year	Permittee Committee should meet a minimum of six times a year. Also, this committee should be in place thirty days after the approval of the new permit.	Concur with Region 8.
2	Permittees shall maintain a representative and alternate as designated in writing, convey any changes in 60 days	Good	Concur with Region 8.
3	Permittees shall be represented at a minimum of two Permittee meetings	Permittees shall be represented at a minimum of eighty percent of meetings.	Concur with Region 8. This measure of compliance should be determined on an annual basis.
4	Implementation Agreement shall be revised to include new cities. Additional changes in program management and funding shall be reviewed concurrently.	Good	Concur with Region 8. This measure of compliance shall be evaluated on an annual basis.
5	Coordination and common training shall be investigated with other public agencies that have an impact on stormwater quality.	Coordination and common training shall be investigated with other agencies that have an impact on storm water quality. Also, to be included will be other permit management training. Examples DAMP training, administrative requirements, methods on uniformed reporting requirements for annual reports, and minimal annual reports requirements.	Beyond just <u>investigating</u> coordination and common training with other agencies, demonstration that these efforts have been <u>conducted</u> should be required. Attendance to such common training and coordination shall be mandatory for all co-permittees.
Plan Development (Section 3.0)			

DAMP Performance Commitments

		Region 8 Comments	Region 9 Comments 2/20/01
1	The DAMP shall be revised and submitted as the proposed plan for each ROWD	Good	DAMP revisions and improvements should be an on-going dynamic process. Improvements should be made whenever new technical information is available. It has been our experience that new information and research becomes available in scientific journals or conferences on a continuing basis.
2	Permittees shall assess the watersheds on a rolling priority basis to evaluate the urban impacts on water quality and opportunities to configure or reconfigure channel segments	Good	Concur with Region 8
3	Permittees shall contribute to the revision of the CA BMP Manuals and, upon completion, assess BMPs for inclusion into the NPDES program pursuant to Section 3.2.2	The permittees should think about including other agencies such as Cal Trans, surrounding counties, private industry, and universities.	Concur with Region 8
4	The Permittee shall assess and evaluate the data from site specific BMPs	From the assessment, evaluations, and review of annual monitoring data, begin to rank BMPs from most effective to least effective for a particular activity. From this they can create a useable list to disseminate to co-permittees.	Concur with Region 8. It may be useful to have such information available on the internet.

Public Agency Activities (Section 5.0)

1	Principal Permittee shall develop and distribute model maintenance procedures for public agency activities (by Jul-Sept 2002)	Let's fast track this program since a lot of Section 5 relies heavily upon these model maintenance procedures	This task shall be completed within 180 days of permit issuance
2	Principal Permittee shall develop and distribute BMP guidance for public agency and contract field O&M staff	Good	Concur with Region 8

DAMP Performance Commitments

		Region 8 Comments	Region 9 Comments 2/20/01
3	Principal Permittee shall provide training to the public agency staff implementing the model maintenance procedures three times during the permit period	Good	Each permittee should also provide their own in-house staff training at least on an annual basis. The purpose of this is to increase communication and coordination among municipal departments.
4	Each Permittee adopting the model maintenance procedures shall be represented at a minimum of two of the training sessions	Good	Concur with Region 8
5	Principal Permittee shall provide pollution prevention training to the public agency and contract field operations staff three times during the permit period	Good	Each permittee should also provide their own in-house staff training at least on an annual basis. The purpose is of this is to increase communication and coordination among municipal departments.
6	Each Permittee shall be represented at a minimum of two of the pollution prevention training sessions	Good	Each permittee should also provide their own in-house staff training at least on an annual basis. The purpose is of this is to increase communication and coordination among municipal departments.
7	Each Permittee shall document any non-Permittee sponsored workshops, training or educational activities undertaken	Good	Beyond just documenting that such events are taking place, each co-permittee should make some documented effort to inform the regulated community that these resources exist. This permittees should be aware of such things as the educational efforts of local non-profits. The co-permittees should also work to become partners in such efforts.

DAMP Performance Commitments

		Region 8 Comments	Region 9 Comments 2/20/01
8	Principal Permittee shall evaluate the efficiency and cost effectiveness of the available BMPs for litter control and provide a recommendation (by July 2003)	Fast tracking this study with information already obtained from previous ROWD and annual reports would be recommended. Taking in to account that Water Quality Ordinance and existing municipal codes already exist. Review of collected data an uniformed reporting program should be developed.	Task shall be completed within 365 days of permit issuance
9	Each Permittee shall inspect 80% of the storm drain inlets and catch basins within their jurisdiction at least once per year with subsequent cleaning based upon criteria developed.	This is good but we may improve the commitment by the fast track of the Model Maintenance Manual. Implementation of this should be in place by the end of 2001.	Concur with Region 8
10	Each Permittee shall evaluate the need for additional diversions based on water quality monitoring and water quality planning data.	Good	Concur with Region 8
11	Each Permittee shall provide any significant changes to their storm drain systems in electronic format to the Principal Permittee for inclusion into the countywide drainage maps	Good	Concur with Region 8
12	Each Permittee shall consider pollutant removal effectiveness when purchasing street sweeper equipment	The commitments proposed are the same that were made for the second term permit. This program should already be in place. Our recommendation should be to set up an uniformed program of reporting information and performances of litter control, street sweeping, etc.	Concur with Region 8

DAMP Performance Commitments

		Region 8 Comments	Region 9 Comments 2/20/01
13	Permittees shall evaluate applying the Environmental Performance Reporting (EPR) Program to municipal maintenance contracts and leases	A tracking system should be developed to ensure compliance with the Environmental Performance. This would allow contractors and leasors with activities that cause supplies to be exposed to stormwater to become aware of the minimum requirements.	Concur with Region 8. Throughout the DAMP, there are commitments which "evaluate applying" programs. For the term of this five year permit, "evaluating" does not go far enough to protect water quality. Through the first two terms, the permittees should have gathered enough information to have already determined what programs should be implemented. Therefore, commitments towards implementation should already be in place.
14	Permittees shall evaluate applying the EPR Program to municipal or contract field maintenance operations	Same as above	Concur with Region 8.
15	Principal Permittee shall provide EPR training a minimum of three items during the permit period	Good	Concur with Region 8.
16	The Permittees shall be represented at a minimum of two of the EPR trainings	Good	Concur with Region 8.
17	Principal Permittee shall evaluate the Fertilizer and Pesticide Guidelines to determine the need for revision	The need for revision has been proven through the monitoring program. A unified reporting system needs to be developed quickly	Task shall be completed within 365 days of permit issuance
18	Principal Permittee shall provide training on the Management Guidelines for the Use of Fertilizers and Pesticides as the same may be revised	Good	Good
19	Each Permittee shall be represented at the Fertilizer and Pesticide training	Good	Good
Public Education (Section 6.0)			
1	The Permittees shall establish a public education committee	Good	Concur with Region 8.

DAMP Performance Commitments

		Region 8 Comments	Region 9 Comments 2/20/01
2	The public education committee shall meet a minimum of three times per year	Good	Concur with Region 8.
3	The public education committee members shall attend a minimum of two of three meetings per year	Good	Concur with Region 8.
4	The Permittees shall complete a public awareness survey	Good	Concur with Region 8.
5	The Permittees and public education committee shall implement elements of the long term strategy based upon the survey results	Good	Concur with Region 8.
6	Each Permittee shall conduct a mass distribution of public education information to approximately 20% of their residents each year	Good	Concur with Region 8
7	The Permittees shall sponsor or staff a stormwater table or booth for at least one community outreach event per year.	Good	<u>Each</u> permittee shall sponsor or staff a stormwater outreach event per year.
8	The Principal Permittee shall continue to coordinate and participate with similar joint outreach programs	Good	Concur with Region 8
9	The Permittees shall provide stormwater program outreach to all municipal staff at least once per year	Good	Concur with Region 8
10	The Principal Permittee shall develop BMP guidance for restaurants, automotive service centers and gasoline stations and provide them to existing industrial facility inspectors	Good	Concur with Region 8
11	The Principal Permittee shall develop BMP guidance for at least three non-fixed facility businesses during the permit	Good	The Principal Permittee shall develop BMP guidance for at least mobile auto detailers, mobile power washers, and carpet cleaners.

DAMP Performance Commitments

		Region 8 Comments	Region 9 Comments 2/20/01
12	The Principal Permittee shall identify any trade associations, etc. common to the non-fixed facility and conduct additional outreach	Good	Concur with Region 8

New Development/Significant Redevelopment (Section 7.0)

1	Re-establish the New Development and Construction Task Force (NDCTF) to evaluate the need to revise Appendix G	The co-permittees should develop from the management committee and input from the BIA, AGC, and CELSOC the following: 1) a planning and review process; 2) categories of classes of development to incorporate BMPs into site designs and maintenance of those BMPs or WQMPs throughout the life of the project; 3) procedures and requirements to help ensure the applicable construction projects comply with the State of California General Construction Permit and 4) an education program for developers and contractors.	Concur with Region 8
---	--	---	----------------------

DAMP Performance Commitments

		Region 8 Comments	Region 9 Comments 2/20/01
2	The Principal Permittee shall develop a training program based on the revisions to Appendix G	The co-permittees shall at a minimum follow a similar process for 1) modifying the approval process for grading, building, and similar permits to include incorporation of Appendix G, California Construction Handbook, etc; 2) providing a copy of guidelines for new development and redevelopment and BMPs to the applicants at the beginning of the permitting process; 3) requiring applicants to continually update WQMPs and BMPs as the project moves through the different phases; 4) requiring incorporation of the identified structural and non-structural BMPs; and 5) requiring notification to the RWQCB projects over five acres or more.	Concur with Region 8
3	The Permittees shall verify 90% of the approved WQMPs each year through inspections, self certifications, surveys, etc.	See previous comments	Concur with Region 8
4	The Principal Permittee shall provide training a minimum of three times during the permit period to the Permittees on any revisions made to Appendix G	See previous comments	This training should be provided on at least on an annual basis and should be offered to the regulated community as well as the co-permittees.
5	Each Permittee shall be represented at a minimum of two of the Appendix G trainings	See previous comments	Good

DAMP Performance Commitments

	Region 8 Comments	Region 9 Comments 2/20/01
6 Each Permittee shall document any non-Permittee sponsored workshops, training or education activities undertaken	See previous comments	Beyond just documenting that such events are taking place, each co-permittee should make some documented effort to inform the regulated community that these resources exist. The permittees should work to become partners in such efforts.

Construction (Section 8.0)

1 The Permittees shall review current grading/erosion control ordinances for consistency with related regulatory documents	Good	Ordinances must be amended accordingly. This task should be completed within 365 days of permit issuance
2 Re-establish the New Development and Construction Task Force (NDCTF) to evaluate the need to revise Appendix H	Good	Good
3 The Principal Permittee shall develop a training program based on the revisions to Appendix H	Good	This training should be provided on at least an annual basis and should be offered to the regulated community as well as the co-permittees.
4 Each Permittee shall be represented at a minimum of two of the three Appendix H trainings	Good	Good
5 Each Permittee shall document any non-Permittee sponsored workshops, training or educational activities undertaken	Good	Beyond just documenting that such events are taking place, each co-permittee should make some documented effort to inform the regulated community that these resources exist. The co-permittees should also work to become partners in such efforts.

Industrial Discharger Identification (Section 9.0)

DAMP Performance Commitments

		Region 8 Comments	Region 9 Comments 2/20/01
1	The Permittees shall evaluate the feasibility of establishing a mechanism for the local identification of businesses that need to obtain coverage under the Construction Permit	A program must be developed to include identification of businesses that need coverage under the State of California General Industrial Permit. Co-permittees then should provide potential businesses with a SWPPP checklist, provide a list of mandatory SIC codes, provide a point of contact with city, county, and state agencies, provide training to staff and agencies in regards to NPDES requirements, and create a tracking or reporting system to show efficiency.	Concur with Region 8. Such programs are absolutely necessary. This process should be begun within 180 days of permit issuance.

Detection/Elimination of Illegal Discharges and Illicit Connections (Section 10.0)

1	The Principal Permittee shall provide stormwater quality awareness training to staff of existing industrial inspection programs a minimum of three times during the permit period	Good	Concur with Region 8
2	Authorized inspectors shall meet three times per year	Good	Concur with Region 8
3	Each permittee shall be represented at a minimum of two of the three authorized inspector meetings	Good	Concur with Region 8
4	The principal permittee shall develop and distribute an electronic water pollution database	Good	Concur with Region 8
5	The permittees shall review and revise sewage spill response procedures as necessary	Good	What does "as necessary" mean? We have already seen that such a commitment is currently needed. A review and update should be conducted after <u>every</u> spill.

DAMP Performance Commitments		
	Region 8 Comments	Region 9 Comments 2/20/01
6	Each Permittee shall document any non-Permittee sponsored workshops, training or educational activities undertaken	Good Beyond just documenting that such events are taking place, each co-permittee should make some documented effort to inform the regulated community that these resources exist. The co-permittees should also work to become partners in such efforts.